

ATTORNEY'S AFFIDAVIT PART 2 OF 2

(13 OF 61 PAGES)

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.
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Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
August 31, 2011
Client Matter No: 1639-102M
Statement No: 159633

Attn: Kay Ellison

Arrow Energy, Inc. (Garnishment)

			<u>Fees</u>			
				Rate	Hours	
08/01/2011	RMD	Preparation for and attendance at hearing on our Motion for Rehearing.		250.00	6.20	1,550.00
08/10/2011	RMD	Emails with Arrow's attorney; review order denying rehearing; telephone conference with R. Boyd; research bond issues; conference call with client.		250.00	1.60	400.00
	HD	Telephone conference with Judge's Chambers regarding entry of order on motion for rehearing; telephone conference with plaintiff's attorney inquiring as to receipt of Court's order; receipt and review of order denying motion for rehearing.		125.00	0.50	62.50
08/15/2011	RMD	Telephone conferences with Arrow's attorney.		250.00	0.40	100.00
08/22/2011	RMD	Receipt and review of Request for Production; telephone conference with Arrow's attorney.		250.00	0.50	125.00
08/23/2011	RMD	Lengthy conference call with client; research garnishment issues.		250.00	1.30	325.00
08/24/2011	RMD	Preparation of Notice of Filing Order on rehearing; e-mails with Arrows' attorney.		250.00	0.50	125.00
08/25/2011	HD	Assist in preparation of and filing our Notice to the Court filing certified copy of the Order Denying our Motion for Rehearing.		125.00	1.10	137.50
	RMD	Receipt and review of Arrow's Motion to Dismiss Appeal; research.		250.00	0.80	200.00
08/26/2011	HD	Email to R. Dunetz forwarding copy of our Notice of Filing.		125.00	0.20	25.00

Southern Sky Air & Tours, LLC

Page: 2

August 31, 2011

Client Matter No: 1639-102M

Statement No: 159633

Arrow Energy, Inc. (Garnishment)

		Rate	Hours	
08/29/2011	RMD Preparation of response to Arrow's Motion to Dismiss Appeal.	250.00	1.10	275.00
08/31/2011	RMD Preparation of response to Motion to Dismiss Appeal.	250.00	0.50	125.00
	For Current Services Rendered		14.70	3,450.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	12.90	\$250.00	\$3,225.00
Heather Durham	1.80	125.00	225.00

Expenses

Tolls/Taxi/Auto Rental	40.00
Long distance telephone charges	70.48
Photocopy charges	3.00
Postage	1.52
Parking	18.00
Total Expenses Through 08/31/2011	133.00

Advances

Transcription fees	150.00
Total Advances Through 08/31/2011	150.00
Total Current Work	3,733.00
Previous Balance	\$21,230.16
Balance Due	<u>\$24,963.16</u>

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Page: 1
September 30, 2011
Client Matter No: 1639-102M
Statement No: 160242

Attn: Kay Ellison

Arrow Energy, Inc. (Garnishment)

Fees

		Rate	Hours	
09/01/2011	RMD Review Arrow's Motion to Dismiss Appeal; preparation of response to Arrow's Motion to Dismiss Appeal.	250.00	2.60	650.00
09/02/2011	RMD Telephone conferences with Arrow's attorney; telephone conference with R. Boyd.	250.00	0.40	100.00
09/06/2011	RMD Lengthy telephone conference with Arrow's attorney concerning garnishment and appeal.	250.00	1.00	250.00
09/07/2011	RMD Preparation of response to Arrow's Motion to Dismiss.	250.00	0.80	200.00
09/08/2011	RMD Telephone conference with R. Boyd; telephone conferences with Arrow's attorney.	250.00	0.50	125.00
09/09/2011	RMD Lengthy telephone conference with Arrow's attorney; receipt and review of e-mail from Arrow's attorney; e-mails with K. Ellison.	250.00	1.30	325.00
09/12/2011	RMD Review docket and determine garnishment pleadings to obtain.	250.00	0.60	150.00
09/14/2011	RMD Telephone conferences with R. Boyd.	250.00	0.40	100.00
09/20/2011	RMD Preparation of Motion to Set Bond Amount.	250.00	0.50	125.00
09/21/2011	RMD Preparation of Motion of Protective Order Regarding Financial Discovery; research and preparation of Motion to Set Bond Amount; telephone conference with R. Boyd.	250.00	4.50	1,125.00

Southern Sky Air & Tours, LLC

Page: 2

September 30, 2011

Client Matter No: 1639-102M

Statement No: 160242

Arrow Energy, Inc. (Garnishment)

		Rate	Hours	
09/30/2011	RMD Telephone conferences with R. Boyd; telephone conferences with Arrow's attorney; e-mails with Arrow's attorney; receipt and review of faxes from Arrow's attorney.	250.00	1.40	350.00
	For Current Services Rendered		14.00	3,500.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	14.00	\$250.00	\$3,500.00

Expenses

Overnight Delivery	17.53
Long distance telephone charges	85.17
Photocopy charges	16.60
Postage	5.72
Total Expenses Through 09/30/2011	125.02

Advances

Clerk of Court	5.00
Online legal research	66.69
Total Advances Through 09/30/2011	71.69

Total Current Work	3,696.71
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Previous Balance	\$24,963.16
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Payments

09/14/2011	Fee Payment	-2,381.87
09/14/2011	Advance Payment	-70.81
09/14/2011	Expense Payment	-29.19
	Total Payments	-2,481.87

Balance Due	<u>\$26,178.00</u>
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Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
October 31, 2011
Client Matter No: 1639-102M
Statement No: 160588

Attn: Kay Ellison

Arrow Energy, Inc. (Garnishment)

Fees

		Rate	Hours	
10/06/2011	RMD Preparation of Motion to Set Bond and Stay Execution.	250.00	0.70	175.00
10/07/2011	MTF Conference with R. Dees regarding status of case and strategy to contest ownership of funds held by garnishee.	225.00	0.50	112.50
	RMD Telephone conferences with R. Boyd; preparation of Motion to Set Bond and Stay Execution; preparation of affidavit of ownership of garnished funds.	250.00	2.30	575.00
10/10/2011	RMD Preparation of affidavit of ownership of \$104,000 in SunTrust; preparation for hearing on our Motion to Set Bond.	250.00	1.10	275.00
10/12/2011	RMD Preparation for hearing on our Motion to Set Bond Amount and for Stay of Execution; preparation of proposed Order.	250.00	3.40	850.00
10/13/2011	RMD Preparation for and attendance at hearing on our Motion to Set Bond and for stay.	250.00	5.20	1,300.00
10/14/2011	RMD Telephone conferences with R. Boyd; research bonding requirements.	250.00	0.60	150.00
10/18/2011	RMD Receipt and review of Order granting our Motion to Set Bond; assist in obtaining supersedeas bond.	250.00	0.80	200.00
10/19/2011	RMD E-mails with R. Boyd.	250.00	0.30	75.00
10/20/2011	HD Prepare Record on Appeal; review Court's index to determine what we need to supplement the record.	125.00	2.10	262.50
10/21/2011	RMD Telephone conference with Jurisco; telephone conference with			

Page: 2
October 31, 2011

Southern Sky Air & Tours, LLC

Client Matter No: 1639-102M
Statement No: 160588

Arrow Energy, Inc. (Garnishment)

			Rate	Hours	
		R. Boyd; e-mails with R. Boyd.	250.00	0.80	200.00
10/24/2011	RMD	Telephone conference with M. Baldwin; e-mails with Jurisco regarding bond; preparation of Motion for Supplement Record on Appeal.	250.00	1.00	250.00
	HD	Prepare motion to supplement record in appeal matter and notice of filing transcript of motion for rehearing proceeding in lower court case.	125.00	1.40	175.00
10/25/2011	RMD	Telephone conference with Jurisco; e-mails with courier; telephone conference with M. Balding; preparation of appeal brief; preparation of Motion for Supplement Record on Appeal.	250.00	2.40	600.00
10/26/2011	RMD	Preparation of Motion for Supplement Record on appeal; e-mails with Arrow's attorney.	250.00	1.00	250.00
	HD	Review email from Arrow Energy's counsel regarding comments concerning our motion to supplement; revise motion to supplement to add additional pleadings.	125.00	0.70	87.50
10/27/2011	RMD	Preparation of initial brief.	250.00	1.00	250.00
	HD	Finalize and filing our motion to supplement; letter to Fourth District Court of Appeal; finalizing and filing original hearing transcript with the trial court.	125.00	0.50	62.50
		For Current Services Rendered		25.80	5,850.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	20.60	\$250.00	\$5,150.00
Michael T. Fackler	0.50	225.00	112.50
Heather Durham	4.70	125.00	587.50

Expenses

Tolls/Taxi/Auto Rental	33.97
Overnight Delivery	13.39
Long distance telephone charges	47.86
Photocopy charges	48.40
Postage	8.92
Airfare	391.40
Lodging	166.49
Total Expenses Through 10/31/2011	710.43

Southern Sky Air & Tours, LLC

Page: 3

October 31, 2011

Client Matter No: 1639-102M

Statement No: 160588

Arrow Energy, Inc. (Garnishment)

Advances

Clerk of Court	8.50
Processor fee	75.00
Online legal research	25.00
Transcription fees	<u>95.00</u>
Total Advances Through 10/31/2011	203.50
 Total Current Work	 6,763.93
 Previous Balance	 \$26,178.00

Balance Due	<u>\$32,941.93</u>
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Page: 1
November 30, 2011
Client Matter No: 1639-102M
Statement No: 160959

Attn: Kay Ellison

Arrow Energy, Inc. (Garnishment)

Previous Balance	\$32,941.93
Balance Due	<u>\$32,941.93</u>

Taxpayer ID Number: 59-3660766

MILAM HOWARD NICANDRI DEES & GILLAM, P.A.

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Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Attn: Kay Ellison

Page: 1
December 31, 2011
Client Matter No: 1639-102M
Statement No: 161334

Arrow Energy, Inc. (Garnishment)

Fees

			Rate	Hours	
12/02/2011	HD	Telephone conference with Clerk of Fourth District Court of Appeal; telephone conference with court reporter's office regarding CD of transcript for hearing on our Motion for Rehearing.	125.00	0.30	37.50
12/05/2011	RMD	Telephone conference with clerk's office; e-mail to Arrow's attorney; e-mails with R. Boyd.	250.00	0.70	175.00
12/06/2011	RMD	Review docket regarding granting Motion for Supplemental Record on Appeal.	250.00	0.20	50.00
12/07/2011	HD	Telephone conference with Fourth District Court of Appeal regarding Order on our Motion to Supplement; preparation of revised Motion for Extension of Time.	125.00	0.60	75.00
12/08/2011	HD	Assist in preparation of and filing Motion for Extension of Time to File Initial Brief.	125.00	1.00	125.00
	RMD	Preparation of Motion for Extension of Time to file initial brief.	250.00	0.30	75.00
12/28/2011	RMD	Preparation of initial brief.	250.00	1.10	275.00
12/29/2011	RMD	Preparation of initial brief.	250.00	1.10	275.00
		For Current Services Rendered		5.30	1,087.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	3.40	\$250.00	\$850.00
Heather Durham	1.90	125.00	237.50

Southern Sky Air & Tours, LLC

Page: 2

December 31, 2011

Client Matter No: 1639-102M

Statement No: 161334

Arrow Energy, Inc. (Garnishment)

Expenses

Long distance telephone charges	1.95
Total Expenses Through 12/31/2011	1.95

Advances

Processor fee	136.00
Total Advances Through 12/31/2011	136.00

Total Current Work	1,225.45
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Previous Balance	\$32,941.93
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Payments

01/03/2012	Advance Payment	-400.00
01/03/2012	Advance Payment	-219.19
01/03/2012	Advance Payment	-176.78
01/03/2012	Advance Payment	-150.00
01/03/2012	Advance Payment	-71.69
01/03/2012	Advance Payment	-203.50
01/03/2012	Expense Payment	-546.06
01/03/2012	Expense Payment	-133.29
01/03/2012	Expense Payment	-113.68
01/03/2012	Expense Payment	-496.79
01/03/2012	Expense Payment	-133.00
01/03/2012	Expense Payment	-125.02
01/03/2012	Expense Payment	-710.43
01/03/2012	Fee Payment	-5,900.00
01/03/2012	Fee Payment	-620.57
	Total Payments	-10,000.00

Balance Due	<u>\$24,167.38</u>
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Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
January 31, 2012
Client Matter No: 1639-102M
Statement No: 161658

Attn: Kay Ellison

Arrow Energy, Inc. (Garnishment)

<u>Fees</u>			Rate	Hours	
01/03/2012	RMD	Preparation of initial brief; telephone conference with clerk's office; preparation of notice to court regarding supplemental record on appeal.	250.00	2.40	600.00
	HD	Preparation of Notice to Court regarding Supplementation of Record.	125.00	0.50	62.50
01/04/2012	HD	Preparation of and serving our Motion for Extension of Time to Serve Initial Brief; telephone conference with court reporter regarding transcript needed in order to supplement Record on Appeal.	125.00	0.90	112.50
01/05/2012	RMD	E-mails with Arrow's attorney; filing Motion for Extension for Initial Brief.	250.00	0.30	75.00
01/09/2012	HD	Receipt of letter from Clerk's office enclosing Supplemental Record and arranging for payment of same.	125.00	0.30	37.50
01/19/2012	RMD	Preparation of initial brief.	250.00	1.30	325.00
01/20/2012	RMD	Preparation of initial brief regarding deposition.	250.00	1.30	325.00
01/23/2012	RMD	Preparation of initial brief.	250.00	2.70	675.00
01/24/2012	RMD	Preparation of initial brief.	250.00	3.50	875.00
	HD	Assist in preparation of Initial Brief.	125.00	2.00	250.00
01/25/2012	RMD	Preparation of initial brief.	250.00	5.60	1,400.00
	HD	Continue assisting in final preparation of Initial Brief; review Fourth DCA's filing requirements for same.	125.00	4.10	512.50

Southern Sky Air & Tours, LLC

Page: 2

January 31, 2012

Client Matter No: 1639-102M

Statement No: 161658

Arrow Energy, Inc. (Garnishment)

		Rate	Hours	
01/26/2012	RMD Final preparation of serving initial brief.	250.00	5.80	1,450.00
	PMR Assist with preparation of initial appellate brief.	275.00	1.20	330.00
	HD Assist in final preparation of and serving our Initial Brief; email to appeals court furnishing Initial Brief in compliance with administrative rules.	125.00	3.60	450.00
	For Current Services Rendered		35.50	7,480.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	22.90	\$250.00	\$5,725.00
Paul M. Renner	1.20	275.00	330.00
Heather Durham	11.40	125.00	1,425.00

Expenses

Overnight Delivery	19.22
Long distance telephone charges	2.39
Photocopy charges	19.20
Postage	3.66
Total Expenses Through 01/31/2012	44.47

Advances

Online legal research	25.00
Total Advances Through 01/31/2012	25.00

Total Current Work	7,549.47
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Previous Balance	\$24,167.38
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Balance Due	<u>\$31,716.85</u>
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Southern Sky Air & Tours, LLC
1600 N. Oak Street, Suite B
Myrtle Beach SC 29577

Page: 1
February 29, 2012
Client Matter No: 1639-102M
Statement No: 162129

Attn: Kay Ellison

Arrow Energy, Inc. (Garnishment)

Fees

		Rate	Hours	
02/17/2012	RMD E-mails with Arrow's attorney.	250.00	0.30	75.00
02/23/2012	RMD Receipt and review of Arrow's Motion for Extension; review docket.	250.00	0.30	75.00
	For Current Services Rendered		0.60	150.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Robert M. Dees	0.60	\$250.00	\$150.00

Advances

Transcription fees	40.00
Total Advances Through 02/29/2012	40.00
Total Current Work	190.00
Previous Balance	\$31,716.85
Balance Due	<u>\$31,906.85</u>

Taxpayer ID Number: 59-3660766